1	ROBERT W. FREEMAN Nevada Bar No. 3062 Robert.Freeman@lewisbrisbois.com CHERYL A. GRAMES Nevada Bar No. 12752 Cheryl.Grames@lewisbrisbois.com LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 Telephone: 702.893.3383 Facsimile: 702.893.3789 Attorneys for State Farm Mutual Automobile Insurance Company		
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9	UNITED STATES DISTRICT COURT		
10	DISTRICT OF NEVADA, SOUTHERN DIVISION		
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12	MICHAEL BENEDICT, an individual;	Case No. 2:21-cv-00245-RFB-NJK	
	Plaintiff,	CTIDUI ATION AND ODDED TO	
13	VS.	STIPULATION AND ORDER TO EXTEND THE DEADLINE TO FILE	
14 15	STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, a Foreign	DEFENDANT'S RESPONSE TO PLAINTIFF'S RENEWED MOTION TO COMPEL DISCOVERY RESPONSES	
16	Corporation; DOES I-V; and ROE CORPORATIONS VI-X, inclusive,	(ECF NO. 29)	
17	Defendants.	FIRST REQUEST	
18			
19	Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel of		
20	record, hereby stipulate and request that this Court extend the deadline to file Defendant's Response		
21	to Plaintiff's Renewed Motion to Compel Discovery Responses (ECF No. 29) in the above-		
22	captioned case nine (9) days, up to and including Wednesday, December 1, 2021.		
23	This Request for an extension of time is not sought for any improper purpose or other		
24	purpose of delay. Defendant requires additional time to prepare its Response to address the specific		
25	requests in dispute as well as address the additional arguments Plaintiff's Motion raises.		
26	WHEREFORE, the parties respectfully request that this Court extend the time for the		
27	Defendant to file its response to Plaintiff's Renewed Motion to Compel Discovery Responses by		

nine (9) days from the current deadline of November 22, 2021 up to and including December 1,



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1	2021. Pursuant to Fed. R. Civ. P. 27(a)(3)(B)(4)), any reply to the response must be filed within 7
2	days after service of the response.	
3	DATED this 18 th day of November, 2021.	DATED this 18 th day of November, 2021.
4	LEWIS BRISBOIS BISGAARD & SMITH	DRUMMOND LAW FIRM, P.C.
5	/s/ Cheryl A. Grames	/s/ Craig W. Drummond
6	Robert W. Freeman Nevada Bar No. 3062	Craig W. Drummond, Esq. Nevada Bar No. 11109
7	Cheryl A. Grames Nevada Bar No. 12752	Liberty A. Ringor, Esq. Nevada Bar No. 14417
8	6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118	810 S. Casino Center Blvd., Suite 101 Las Vegas, Nevada 89101
9	Attorneys for State Farm Mutual Automobile Insurance Company	Attorneys for Plaintiff Michael Benedict
10	Thom whee company	
11	<u>ORDER</u>	
12	IT IS SO ORDERED:	
13	Dated: November 19, 2021	
14	Dated. November 13, 2021	1
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16 17	UNITED STATES MAGISTRATE JUDGE	
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LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW 28

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